

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
ALEXANDER NORRIS

Plaintiff,

v.

Marc Goldner, Individually and as Officer
of GOLDEN BELL ENTERTAINMENT,
LLC, a California company and GOLDEN
BELL STUDIOS, LLC, GOLDEN BELL
ENTERTAINMENT, LLC., a Nevada
Company and GOLDEN BELL STUDIOS,
LLC,

Defendants.
-----X

Case No.: 19-cv-05491-PAE-SN

**DECLARATION OF FRANCELINA
M. PERDOMO IN OPPOSITION TO
DEFENDANTS' MOTION TO
AMEND.**

I, Francelina M. Perdomo, Esq., being of full age and under oath, do hereby affirm as follows:

1. I am a partner at Gallet, Dreyer & Berkey, LLP, attorneys for plaintiff Alexander Norris. I make this declaration in opposition to Defendants' motion to amend their answer to assert counterclaims. I have personal knowledge of the facts set forth below.

2. On or around March 29, 2019, I received a letter from Defendants' then-counsel, Garson, Segal, Steinmetz, Fladgate LLP ("GS2 Law"), asserting that Plaintiff had breached the parties' Collaboration Agreement, and further asserting that Plaintiff was liable for copyright infringement and tortious interference. A true and correct copy of that letter is attached as Exhibit A.

3. On or around July 10, 2021, Plaintiff responded to Defendants' Requests for Production, and has produced thousands of pages of documents to date. A true and correct copy of that response is attached as Exhibit B.

4. Defendants objected to Plaintiff's responses to the Requests for Production and demanded further documents. After the parties met and conferred, Plaintiff produced further documents. A true and correct copy of Plaintiff's response is attached as Exhibit C.

5. On the afternoon of August 23, 2022 the day before deposition of Defendants' principal Marc Goldner, Defendants produced approximately 3,000 documents. Defendants had never informed Plaintiffs that those documents would be forthcoming. The following evening, after Goldner's deposition had already been conducted, Defendants served an approximately 600 additional documents. Discovery then ended on August 24, 2020.

WHEREFORE, I respectfully request that the Court deny Defendants' motion to amend their answer to assert counterclaims.

I certify that the statements made herein are true and accurate to the best of my recollection, knowledge, information and belief. I am aware that willfully false statements are subject to punishment.

Dated: New York, New York
November 16, 2022

Francelina M. Perdomo
Francelina M. Perdomo

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November 2022, I caused to be served a copy of the foregoing, including Exhibit A – C, via the Court’s ECF filing system, on the following:

Gerard Patrick Fox
Gerard Fox Law, P.C.
1880 Century Park East
Suite 1410
Los Angeles, CA 90067
310-441-0500
Email: gfox@gerardfoxlaw.com

Ryan Dolan
Gerard Fox Law P.C.
1345 Sixth Avenue
33rd Floor
10105
New York, NY 10006
661-364-7254
Email: rdolan@gerardfoxlaw.com

Attorneys for Defendants

/s/ Kyle G. Kunst
Kyle G. Kunst